

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In Re:) Case No. 19-47261-705
Sandra Lee Jost,) Chapter 7
Debtor.)
)
) Response Date: January 14, 2020
) Hearing Date: January 21, 2020
) Hearing Time: 9:30 a.m.
) Location: St. Louis, Courtroom 7S
)

**DEBTOR'S RESPONSES TO CREDITOR BANK OF AMERICA, N.A.'S MOTION
FOR RELIEF FROM AUTOMATIC STAY (REAL PROPERTY)**

COMES NOW Sandra Lee Jost ("Debtor"), by and through counsel, and respectfully states as follows her Responses to Movant, Bank of America, N.A.'s Motion for Relief from Automatic Stay:

1. Debtor admits the allegations contained in paragraphs 1 and 9 of the Motion.
2. Debtor denies the allegations contained in paragraphs 2 through 8 and 10 – 11 of the Motion and demands strict proof thereof.
3. Further answering, Debtor states that the trustee is investigating the possibility of equity in the house, which suggests the possibility of an equity cushion.
4. Further answering, Debtor states that if the Trustee does not sell the home, Debtor may strip the consensual liens and sell the house itself.

WHEREFORE, Debtor prays that the relief sought in the Motion be denied, and for such other and further relief as this Court deems appropriate.

DANNA MCKITRICK, P.C.

By: /s/ A. Thomas DeWoskin
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CERTIFICATE OF SERVICE

The Notice of Electronic Filing indicates that all necessary parties were served with this corrected document via the Court's CM/ECF system on January 7, 2020.

/s/ A. Thomas DeWoskin
A. Thomas DeWoskin